

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CITY OF PROVIDENCE v. BATS GLOBAL MARKETS, INC., et al.	x	:	Civil No. 1:14-cv-02811-JMF
	x		

AMERICAN EUROPEAN INSURANCE COMPANY v. BATS GLOBAL MARKETS, INC., et al.	x	:	Civil No. 1:14-cv-03133-JMF
	x		

HAREL INSURANCE CO., LTD. v. BATS GLOBAL MARKETS, INC., et al.	x	:	Civil No. 1:14-cv-03608-JMF
	x		

FLYNN v. BANK OF AMERICA CORPORATION, et al.	x	:	Civil No. 1:14-cv-04321-JMF
	x		

**NOTICE OF MOTION TO APPOINT JAMES J. FLYNN AND DOMINIC A. MORELLI
AS LEAD PLAINTIFFS AND APPROVAL OF THEIR SELECTION OF LEAD
COUNSEL**

PLEASE TAKE NOTICE that class members James J. Flynn and Dominic A. Morelli (“Movants”) hereby move this Court pursuant to Fed. R. Civ. P. 42(c) and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 77z-1, at the United States District Court for the Southern District of New York, before the Honorable Jesse M. Furman, located at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order: (a) appointing Movants to serve as lead plaintiffs; and (b) approving their selection of co-lead counsel for the class.

In support of their motion, Movants submit: (a) a Memorandum of Law, dated June 17, 2014 and related exhibits; and (b) a Proposed Order granting Movants’ motion for appointment as lead plaintiffs and approval of their selection of co-lead counsel for the class.

Dated: June 17, 2014

Respectfully submitted,

**LOVELL STEWART HALEBIAN JACOBSON
LLP**

/s/ Victor E. Stewart

Victor E. Stewart (vestewart@lshllp.com)

61 Broadway, Suite 501

New York, NY 10006

Telephone: (212) 608-1900

Facsimile: (212) 719-4677